

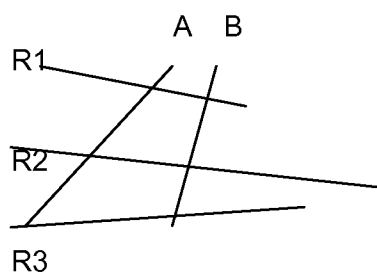
REMARKS

In the Office Action mailed September 15, 2005, the Examiner noted that claims 1-4, 6-48 and 50-51 were pending, and rejected claims 1-4, 6-48 and 50-51. Claims 1, 9, 18, 23, 31, 40, 45-48 and 50 have been amended, claims 5 and 49 have been previously canceled, new claim 52 has been added and, thus, in view of the forgoing claims 1-4, 6-48 and 50-52 remain pending for reconsideration which is requested. No new matter has been added. The Examiner's rejections are traversed below.

On page 4 of the Office Action, the Examiner rejected all claims under 35 U.S.C. § 102 as anticipated by Fujii.

An interview was conducted with the Examiner during which the features of the present invention and the distinctions over Fujii were discussed.

As discussed with the Examiner, the present invention compares position, type, direction for vicinal feature points looking for a match. The Examiner noted the n-th degree distance mentioned by Fujii (see for example, Fujii, col. 11, lines 9-31 and col. 15, lines 31-45). This distance, as discussed with the Examiner is a count of ridges ("a distance on a ridge from a measurement start point to another feature point ... spaced apart therefrom by n ridges ... is referred to as an n-th degree main distance..." - Fujii, col. 11, lines 9-17). Such a ridge count is not a true distance measurement as depicted by the diagram discussed below.



In the diagram above we have three ridges, R1, R2 and R3 and two lines A and B. The distance along line B between ridges R1 and R3 is quite a bit shorter than the distance along line A between ridges R1 and R3. However, when a ridge count is used, according to Fujii the nth-degree distances are the same. In addition, as can be seen from the above diagram, this n-th degree distance has no direction information.

For the above-discussed reasons, it is submitted that the present invention is distinguishable over Fujii.

During the interview the Examiner also noted the "connection direction" mentioned in Fujii (see, for example, Fujii, col. 3, lines 64-67). We pointed out to the Examiner that this was a connection direction from a start point or a feature point to another feature point (see, for

example Fujii claim 5). As noted to the Examiner, the invention present invention has a feature point direction, something very different from a connection direction. The Examiner argued that they could be considered equivalent. However, to make them equivalent the Examiner would have to ignore the word "connection" or interpret Fujii as if the teaching about connection did not exist. It is submitted that the Examiner cannot ignore this word or engage in such a misinterpretation.

For the above-discussed additional reasons it is submitted that the present invention is distinguishable over Fujii.

In addition, in the present invention the feature point direction is "associated with a ridge direction" (see claims 1, 9, 18, 23, 31, 40, 45-48 and 50) as discussed in the application on page 17 and shown in figure 1. As discussed above, the Fujii connection direction has no relation to the direction of a ridge but is instead a direction from a start point or a feature point to another feature point.

For the above-discussed further reasons it is submitted that the present invention is distinguishable over Fujii.

It is submitted that the present claimed invention patentably distinguishes over Fujii and withdrawal of the rejection is requested.

The dependent claims depend from the above-discussed independent claims and are patentable over the prior art for the reasons discussed above. The dependent claims also recite additional features not taught or suggested by the prior art. Fujii is about trying to determine whether fingerprints match. While the present invention is about comparing fingerprints, it is also about something more detailed. The present invention is about trying to determine whether two feature points are the same ("are same feature points" - claim 1). To make this determination a number of different measures are made. For example, claim 3 calls for the feature points to be the "same feature points" when "in a predetermined range". The prior art of Fujii does not teach or suggest such. It is submitted that the dependent claims are independently patentable over the prior art.

New claim 52 emphasizes that the features of the present invention include "comparing direction of a target vicinal feature point in the first fingerprint with position, type and direction of a corresponding feature point in the second fingerprint where feature point direction is ridge direction when the feature point is an end point and a direction of a larger number of ridges when the feature point is a bifurcation point". (See application page 17, lines 18-25) Nothing in the prior art teaches or suggests such. It is submitted that the new claim, which is different and not narrower than prior filed claims distinguishes over the prior art of Fujii.

It is submitted that the claims are not taught, disclosed or suggested by the prior art. The claims are therefore in a condition suitable for allowance. An early Notice of Allowance is requested.

If any further fees, other than and except for the issue fee, are necessary with respect to this paper, the U.S.P.T.O. is requested to obtain the same from deposit account number 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

Date: March 15, 2006

By: /J. Randall Beckers/
J. Randall Beckers
Registration No. 30,358

1201 New York Avenue, NW, Suite 700
Washington, D.C. 20005
Telephone: (202) 434-1500
Facsimile: (202) 434-1501